

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] CARLOS MANUEL COTTO-CRUZ,
a/k/a "Wasa," "Zion," "Loco," "Alto
Rango," "Ministro,"

(Counts One through Six)

[2] HECTOR LUIS SANTIAGO-
MEDINA,

a/k/a "Gordo Casco," "El Incorregible,"
(Counts One through Six)

[3] LUIS DANIEL GARCIA-
HERNANDEZ,

a/k/a "Luisda," "Ele-D," "El Enano,"
(Counts One through Six)

[4] JERMAINE CALDERON-
ECHEVARRIA,

a/k/a "Jey," "Jeso," "Pupi,"
(Counts One through Six)

[5] VICTOR ISAAC DEL VALLE-
RIVERA,

(Counts One through Six)

[6] LUIS MANUEL ORTIZ-ROMERO,
a/k/a "Yiyo,"

(Counts ONE through Five)

[7] JOSE LUIS CASTRO-VAZQUEZ,
a/k/a "Manota,"

(Counts One through Six)

[8] FABIAN NIEVES-ROSALES,
a/k/a "Chino,"

(Counts One through Six)

[9] KAREM LYNETTE VARCARCEL-
CRUZ,

a/k/a "La Prieta,"

(Counts One through Six)

[10] PEDRO ALEJANDRO OCASIO-
HERNANDEZ,

INDICTMENT

FILED UNDER SEAL

CRIMINAL NO. 22-213 (ADC)

Violations:

(COUNT ONE)

Title 21 U.S.C. §§ 841(a)(1), 846 and
860.

(COUNT TWO)

Title 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(i)
and 860 and Title 18, U.S.C. § 2.

(COUNT THREE)

Title 21 U.S.C. §§841(a)(1),
(b)(1)(A)(iii) and 860 and Title 18,
U.S.C. § 2.

(COUNT FOUR)

Title 21 U.S.C. §§841(a)(1), (b)(1)(A)(ii)
and 860 and Title 18, U.S.C. § 2.

(COUNT FIVE)

Title 21 U.S.C. §§841(a)(1),
(b)(1)(B)(vii) and 860 and Title 18,
U.S.C. § 2.

(COUNT SIX)

Title 18 U.S.C. §§924(c).

(COUNT SEVEN)

Title 18 U.S.C. § 1956(a)(1)(B)(i) & (h)

Narcotics Forfeiture Allegation

Title 21 U.S.C. § 853 and Rule 32.2(a)
F.R.C.P.

**Firearms and Ammunition Forfeiture
Allegation**

Title 18 U.S.C. § 924(d)(1); Title 28

a/k/a “Chino,”

(Counts One through Six)

[11] GIOVANNI ANDRES REYES-CRUZ,

**a/k/a “Koala,” “Ken-Y,” “El Animal,”
“Koa,”**

(Counts One through Six)

[12] LUIS MANUEL VEGA-QUILES,

a/k/a “Luisma,” “Sangre,”

(Counts One through Six)

[13] LUIS NIKE SANTIAGO-MEDINA,

(Counts One through Five)

[14] GABRIEL CASANOVA-YALES,

a/k/a “Gaby Luchy,”

(Counts One through Six)

[15] FERNANDO IAN CANINO-ORTIZ,

a/k/a “Ian,”

(Counts One through Six)

[16] CARLOS J. SANTOS-DIAZ,

a/k/a “Mambiche,”

(Counts One through Six)

[17] JUAN RUIZ-DIAZ,

a/k/a “Pra Pra,”

(Counts One through Five)

[18] RUBEN FIGUEROA-RODRIGUEZ,

a/k/a “Ruben el Gordo,”

(Counts One through Six)

[19] LUIS MIGUEL MUÑOZ-LOPEZ,

a/k/a “Chino, “Chino Grillo,”

(Counts One through Six)

[20] LUIS ALBERTO CINTRON-COLLAZO,

a/k/a “Pacho, El Negro,”

(Counts One through Six)

[21] PABLO DE LA CRUZ-ARIAS,

a/k/a “Pablo El Diablo,”

(Counts One through Six)

[22] PEDRO VICTOR NIEVES-HERNANDEZ,

a/k/a “Pedrito,”

(Counts One through Six)

[23] MARIO ALEXANDER RIVERA,

(Counts One through Six)

[24] CARLOS A BENITEZ-ROLON,

U.S.C. § 2461 (c); and Rule 32.2(a)
F.R.C.P.

(SEVEN COUNTS)

a/k/a “Charlie,” “Charlie el Negro,”
(Counts One through Six)

[25] JESUS DAVID MALDONADO-MORALES,

a/k/a “Chu,” “Chuito,”
(Counts One through Six)

[26] YAN CARLOS DE JESUS-ORTIZ,
a/k/a “Cepi,” “Cepi El Escudo,”

(Counts One through Five)

[27] ARSENIO LABORDE-FIGUEROA,
(Counts One through Six)

[28] OMAR QUILES-ARCE a/k/a
“Tibu,”

(Counts One through Five)

[29] JUAN FRANCISCO TORRES-HUERTAS a/k/a “Cano,” “Canito,”
“Jonathan,”

(Counts One through Six)

[30] JULIO ANGEL GALARZA-ROSADO,

(Counts One through Six)

[31] KEVIN JOMAR MALDONADO-ROSA,

(Counts One through Five)

[32] ALEX DARNEL RODRIGUEZ-HUERTAS,

a/k/a “Darnel,”

(Counts One through Six)

[33] LINO ACOSTA-LOPEZ,

(Counts One through Six)

[34] KRISTIAN DAMIAN MARTINEZ-CRUZ,

(Counts One through Five)

[35] ANGEL RAFAEL TORRES-REYES

a/k/a “Mickey Wood,”

(Counts One through Five)

[36] ORLANDO JOSE RODRIGUEZ-LARA,

a/k/a “Trippy,”

(Counts One through Five)

[37] KIBANIELLE ICHAEAL COLON-MUÑIZ a/k/a “Kiba,” “Kiva,”

(Counts One through Five)

[38] CHRIS ANTHONY JIMENEZ-

ORTIZ,
(Counts One through Five)
[39] KENNY J RODRIGUEZ-
RODRIGUEZ
a/k/a “Kencho,” “Kenny Kencho,” “Ian,”
(Counts One through Five)
[40] KEYSHLA MICHELLE
RODRIGUEZ-ACEVEDO,
(Counts One through Five)
[41] KELVIN JOEL TORRES-FLORES,
(Counts One through Five)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute Controlled Substances

From in or about the year 2016, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] CARLOS MANUEL COTTO-CRUZ, a/k/a “Wasa,” “Zion,” “Loco,” “Alto Rango,” “Ministro,”
[2] HECTOR LUIS SANTIAGO-MEDINA, a/k/a “Gordo Casco,” “El Incorregible,”
[3] LUIS DANIEL GARCIA-HERNANDEZ, a/k/a “Luisda,” “Ele-D,” “El Enano,”
[4] JERMAINE CALDERON-ECHEVARRIA, a/k/a “Jey,” “Jeso,” “Pupi,”
[5] VICTOR ISAAC DEL VALLE-RIVERA,
[6] LUIS MANUEL ORTIZ-ROMERO, a/k/a “Yiyo,”
[7] JOSE LUIS CASTRO-VAZQUEZ, a/k/a “Manota,”
[8] FABIAN NIEVES-ROSALES, a/k/a “Chino,”
[9] KAREM LYNETTE VARCARCEL-CRUZ, a/k/a “La Prieta,”
[10] PEDRO ALEJANDRO OCASIO-HERNANDEZ, a/k/a “Chino,”
[11] GIOVANNI ANDRES REYES-CRUZ, a/k/a “Koala,” “Ken-Y,” “El Animal,” “Koa,”
[12] LUIS MANUEL VEGA-QUILES, a/k/a “Luisma,” “Sangre,”
[13] LUIS NIKE SANTIAGO-MEDINA,
[14] GABRIEL CASANOVA-YALES, a/k/a “Gaby Lucky”

- [15] FERNANDO IAN CANINO-ORTIZ, a/k/a "Ian,"
- [16] CARLOS J. SANTOS-DIAZ, a/k/a "Mambiche,"
- [17] JUAN RUIZ-DIAZ, a/k/a "Pra Pra,"
- [18] RUBEN FIGUEROA-RODRIGUEZ, a/k/a "Ruben el Gordo,"
- [19] LUIS MIGUEL MUÑOZ-LOPEZ, a/k/a "Chino, Chino Grillo,"
- [20] LUIS ALBERTO CINTRON-COLLAZO, a/k/a "Pacho," "El Negro,"
- [21] PABLO DE LA CRUZ-ARIAS, a/k/a "Pablo El Diablo"
- [22] PEDRO VICTOR NIEVES-HERNANDEZ, a/k/a "Pedrito,"
- [23] MARIO ALEXANDER RIVERA,
- [24] CARLOS A BENITEZ-ROLON, a/k/a "Charlie," "Charlie el Negro,"
- [25] JESUS DAVID MALDONADO-MORALES, a/k/a "Chu," "Chuito,"
- [26] YAN CARLOS DE JESUS-ORTIZ, a/k/a "Cepi," "Cepi El Escudo,"
- [27] ARSENIO LABORDE-FIGUEROA,
- [28] OMAR QUILES-ARCE a/k/a "Tibu,"
- [29] JUAN FRANCISCO TORRES-HUERTAS a/k/a "Cano," "Canito," "Jonathan,"
- [30] JULIO ANGEL GALARZA-ROSADO,
- [31] KEVIN JOMAR MALDONADO-ROSA,
- [32] ALEX DARNEL RODRIGUEZ-HUERTAS, a/k/a "Darnel,"
- [33] LINO ACOSTA-LOPEZ,
- [34] KRISTIAN DAMIAN MARTINEZ-CRUZ,
- [35] ANGEL RAFAEL TORRES-REYES, a/k/a "Mickey Wood,"
- [36] ORLANDO JOSE RODRIGUEZ-LARA a/k/a "Trippy,"
- [37] KIBANIELLE ICHAEAL COLON-MUÑIZ a/k/a "Kiba," "Kiva,"
- [38] CHRIS ANTHONY JIMENEZ-ORTIZ,
- [39] KENNY J RODRIGUEZ-RODRIGUEZ a/k/a "Kencho," "Kenny Kencho,"
Ian,"
- [40] KEYSHLA MICHELLE RODRIGUEZ-ACEVEDO, AND
- [41] KELVIN JOEL TORRES-FLORES,

the defendants herein, did knowingly and intentionally combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and distribute controlled substances, to wit: one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance; two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; five (5) kilograms or more of a mixture

or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I, Controlled Substance; detectable amounts of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance, detectable amounts of Alprazolam (commonly known as Xanax), a Schedule IV Controlled Substance, detectable amounts of Buprenorphine (commonly known as Suboxone) a Schedule III Controlled Substance, and detectable amounts of Tramadol a Schedule IV Controlled Substance, all within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is, the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, the Luis Llorens Torres Public Housing Project, and other areas nearby. All in violation of Title 21, U.S.C. §§ 841(a)(1), 846, and 860.

I. OBJECT OF THE CONSPIRACY

The object of the conspiracy was to operate a drug-trafficking organization (DTO) to distribute controlled substances at the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, the Luis Llorens Torres Public Housing Project, and other areas in the Municipality of San Juan in the continental United States, all for significant financial gain and profit.

II. MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would accomplish and further the object of the conspiracy included among other things the following:

1. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would operate several drug points in the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, the Luis Llorens Torres Public Housing Project, and other areas in the municipality of San Juan.
2. It was further part of the manner and means and of the conspiracy that the defendants and their co-conspirators would sell street quantities amounts of heroin, cocaine base ("crack"), cocaine, marijuana, and prescription pills at the drug distribution points.
3. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would sell the heroin, cocaine base ("crack"), cocaine, marijuana, and prescription pills in small "baggies," vials, decks, or other packaging for sale at the drug distribution points.
4. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would own different drug brands within the drug points located at the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project the Luis Llorens Torres Public Housing Project, and other areas in the municipality of San Juan. The different drug brands were identified by different stickers, colored caps, and colored foils.
5. It was part of the manner and means of the conspiracy that within the Vista Hermosa Public Housing Project, different drug brands owned by different co-conspirators would sell at the drug points.
6. It was part of the manner and means of the conspiracy that the defendants and their

co-conspirators would receive heroin, cocaine, cocaine base (“crack”), marijuana, and prescription pills already packaged for street sale distribution in the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, the Luis Llorens Torres Public Housing Project, and other areas in the municipality of San Juan.

7. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would use abandoned apartments in the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, the Luis Llorens Torres Public Housing Project, and other areas in several municipalities to prepare the drugs for distribution at the drug points.
8. It was part of the manner and means of the conspiracy that the leaders would rent different properties or locations using home rental applications (eg., AirBnb, etc.) in order to use them as stash places to store kilogram quantities of heroin, cocaine, cocaine base (“crack”), marijuana, US Currency, firearms and ammunition in order to avoid detection from law enforcement. Additionally, these locations were also commonly used to store, cook, pack, and prepare narcotics for street distribution.
9. It was part of the manner and means of the conspiracy that members of the DTO received shipments of narcotics at the coastlines of Puerto Rico from vessels that had traveled from Venezuela and Dominican Republic.

10. It was part of the manner and means of the conspiracy that the members of the DTO would meet inside the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, and the Luis Llorens Torres Public Housing Project to discuss the operations of the DTO and to plan violent acts against members of their own drug trafficking organization or members of a rival drug trafficking gang.
11. It was part of the manner and means of the conspiracy that when co-conspirators held meetings to plan shootings and other violent acts, members of the DTO dressed in black or dark clothing in order to hide from rival gang members, avoid identification, and avoid law enforcement detection. During the conspiracy members of the organization would carry firearms of different makes, models, and calibers such as pistols and high-power rifles.
12. It was part of the manner and means of the conspiracy that during the conspiracy, members would carry additional magazines and ammunition in backpacks for quick reloading of firearms during shootings.
13. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would collect a portion of the proceeds from each of the drug point sellers at Vista Hermosa Public Housing Project as "*la prote*" ("*the protection*") to pay the lookouts.
14. It was part of the manner and means of the conspiracy that lookouts at Vista Hermosa Public Housing Project would yell "*atiendelos*" ("*take care of it*") when they detected law enforcement coming into the housing project.

15. It was a further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would have access to vehicles in the name of others in order to transport money, narcotics, firearms and ammunition.
16. It was further part of the manner and means of the conspiracy that the leaders of the drug trafficking organization would order and execute disciplinary action to be imposed upon co-conspirators that broke the rules of the DTO.
17. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would use intimidation, force, and violence in order to maintain control of the drug trafficking operations, intimidate rival drug trafficking organizations, and discipline members of their own drug trafficking organization.
18. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would transfer their firearms to other members of the drug trafficking organization in order to protect themselves, the narcotics, and the proceeds derived from the sales.
19. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would routinely possess, carry, brandish, and use firearms to protect themselves and their drug trafficking organization.
20. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would act in different roles in order to further the goals of the conspiracy, to wit: leaders/suppliers, enforcers, runners, sellers, lookouts, and facilitators.
21. It was further part of the manner and means of the conspiracy that some of the

defendants and their co-conspirators would use two-way radios (“walkie-talkies” referred to as scanners) and cell phones in order to communicate and alert the presence of law enforcement agents or members of rival gangs and to discuss among themselves the operations of the drug distribution points.

III. ROLES OF THE MEMBERS OF THE CONSPIRACY

Leaders/suppliers controlled and supervised the drug trafficking operations at the drug distribution points located within the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, and the Luis Llorens Torres Public Housing Project. During the span of the conspiracy, leaders purchased kilogram quantities of narcotics and oversaw the sale of such narcotics at the drug distribution points. They would receive proceeds from the sale of controlled substances distributed at the drug distribution points. Some of the leaders of the organization would also oversee the transportation and distribution of kilogram quantities of cocaine in the continental United States and would derive profits from those drug trafficking activities. Additionally, leaders would perform or carry out several acts within the conspiracy including but not limited to, supplying narcotics and/or firearms and/or ammunition to the drug distribution organization and/or drug distribution points. At various times during the course of the conspiracy, leaders purchased firearms and allowed members of the conspiracy to carry such firearms and ammunition in order to protect the drug distribution activities. Leaders would also possess firearms in furtherance of the drug trafficking activities of the organization.

Enforcers did possess, carry, brandish, use and discharge firearms to protect the leaders and members of the drug trafficking organization, the narcotics, and the proceeds

derived from their sales, and to further accomplish the goals of the conspiracy. Enforcers often acted upon instructions given by the leaders of this organization. Enforcers would often provide protection to the drug trafficking organization's drug-distribution points.

Runners worked under the supervision of the leaders of the drug trafficking organization. They were responsible for providing sufficient narcotics to the sellers for further distribution at the drug points. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also supervise and make sure that there were street sellers for every shift at the drug points. At various times, they would be responsible for recruiting street sellers and additional runners. The runners would also supervise the sellers and the daily activities at the drug points.

Sellers would distribute street quantity amounts of heroin, crack cocaine, cocaine, and marijuana. As sellers, they were accountable for the drug proceeds and the narcotics sold at the drug-distribution points. At times, sellers would use two-way radios ("walkie-talkies," "scanners") and cell phones in order to communicate with other members of the organization.

Facilitators would serve as messengers for members of the conspiracy. Some facilitators would also work as lookouts for the organization using two-way radios or walkie-talkies to alert sellers and runners of the presence of law enforcement and rival drug traffickers. Some facilitators would aid the leaders and other members of the organization in the handling and management of the organization's proceeds.

All in violation of Title 21 U.S.C. §§ 841(a)(1)(b)(1)(A), 846 and 860.

COUNT TWO

21 U.S.C. § 841(a)(1)
Possession/Distribution of Heroin

From in or about the year 2016, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] CARLOS MANUEL COTTO-CRUZ, a/k/a "Wasa," "Zion," "Loco," "Alto Rango," "Ministro,"
- [2] HECTOR LUIS SANTIAGO-MEDINA, a/k/a "Gordo Casco," "El Incorregible,"
- [3] LUIS DANIEL GARCIA-HERNANDEZ, a/k/a "Luisda," "Ele-D," "El Enano,"
- [4] JERMAINE CALDERON-ECHEVARRIA, a/k/a "Jey," "Jeso," "Pupi,"
- [5] VICTOR ISAAC DEL VALLE-RIVERA,
- [6] LUIS MANUEL ORTIZ-ROMERO, a/k/a "Yiyo,"
- [7] JOSE LUIS CASTRO-VAZQUEZ, a/k/a "Manota,"
- [8] FABIAN NIEVES-ROSALES, a/k/a "Chino,"
- [9] KAREM LYNETTE VARCARCEL-CRUZ, a/k/a "La Prieta,"
- [10] PEDRO ALEJANDRO OCASIO-HERNANDEZ, a/k/a "Chino,"
- [11] GIOVANNI ANDRES REYES-CRUZ, a/k/a "Koala," "Ken-Y," "El Animal," "Koa,"
- [12] LUIS MANUEL VEGA-QUILES, a/k/a "Luisma," "Sangre,"
- [13] LUIS NIKE SANTIAGO-MEDINA,
- [14] GABRIEL CASANOVA-YALES, a/k/a "Gaby Luchy,"
- [15] FERNANDO IAN CANINO-ORTIZ, a/k/a "Ian,"
- [16] CARLOS J. SANTOS-DIAZ, a/k/a "Mambiche,"
- [17] JUAN RUIZ-DIAZ, a/k/a "Pra Pra,"
- [18] RUBEN FIGUEROA-RODRIGUEZ, a/k/a "Ruben el Gordo,"
- [19] LUIS MIGUEL MUÑOZ-LOPEZ, a/k/a "Chino, Chino Grillo,"
- [20] LUIS ALBERTO CINTRON-COLLAZO, a/k/a "Pacho," "El Negro,"
- [21] PABLO DE LA CRUZ-ARIAS, a/k/a "Pablo El Diablo,"
- [22] PEDRO VICTOR NIEVES-HERNANDEZ, a/k/a "Pedrito,"
- [23] MARIO ALEXANDER RIVERA,
- [24] CARLOS A BENITEZ-ROLON, a/k/a "Charlie," "Charlie el Negro,"
- [25] JESUS DAVID MALDONADO-MORALES, a/k/a "Chu," "Chuito,"
- [26] YAN CARLOS DE JESUS-ORTIZ, a/k/a "Cepi," "Cepi El Escudo,"
- [27] ARSENIO LABORDE-FIGUEROA,
- [28] OMAR QUILES-ARCE a/k/a "Tibu"
- [29] JUAN FRANCISCO TORRES-HUERTAS a/k/a "Cano," "Canito," "Jonathan"
- [30] JULIO ANGEL GALARZA-ROSADO,
- [31] KEVIN JOMAR MALDONADO-ROSA,

[32] ALEX DARNEL RODRIGUEZ-HUERTAS, a/k/a "Darnel,"
[33] LINO ACOSTA-LOPEZ,
[34] KRISTIAN DAMIAN MARTINEZ-CRUZ,
[35] ANGEL RAFAEL TORRES-REYES, a/k/a "Mickey Wood,"
[36] ORLANDO JOSE RODRIGUEZ-LARA a/k/a "Trippy,"
[37] KIBANIELLE ICHAEAL COLON-MUÑIZ a/k/a "Kiba," "Kiva,"
[38] CHRIS ANTHONY JIMENEZ-ORTIZ,
[39] KENNY J RODRIGUEZ-RODRIGUEZ a/k/a "Kencho," "Kenny Kencho,"
Ian,"
[40] KEYSHLA MICHELLE RODRIGUEZ-ACEVEDO, AND
[41] KELVIN JOEL TORRES-FLORES

the defendants herein, aiding and abetting one another, did knowingly and intentionally, possess with intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, the Luis Llorens Torres Public Housing Project.

All in violation of Title 21 U.S.C. §§ 841(a)(1)(b)(1)(A)(i) and 860 and Title 18 U.S.C. § 2.

COUNT THREE
21 U.S.C. § 841(a)(1)
Possession/Distribution of Cocaine Base

From in or about the year 2016, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] CARLOS MANUEL COTTO-CRUZ, a/k/a "Wasa," "Zion," "Loco," "Alto Rango," "Ministro,"
[2] HECTOR LUIS SANTIAGO-MEDINA, a/k/a "Gordo Casco," "El Incorregible,"
[3] LUIS DANIEL GARCIA-HERNANDEZ, a/k/a "Luisda," "Ele-D," "El Enano,"

- [4] JERMAINE CALDERON-ECHEVARRIA, a/k/a "Jey," "Jeso," "Pupi,"
- [5] VICTOR ISAAC DEL VALLE-RIVERA,
- [6] LUIS MANUEL ORTIZ-ROMERO, a/k/a "Yiyo,"
- [7] JOSE LUIS CASTRO-VAZQUEZ, a/k/a "Manota,"
- [8] FABIAN NIEVES-ROSALES, a/k/a "Chino,"
- [9] KAREM LYNETTE VARCARCEL-CRUZ, a/k/a "La Prieta,"
- [10] PEDRO ALEJANDRO OCASIO-HERNANDEZ, a/k/a "Chino,"
- [11] GIOVANNI ANDRES REYES-CRUZ, a/k/a "Koala," "Ken-Y," "El Animal," "Koa,"
- [12] LUIS MANUEL VEGA-QUILES, a/k/a "Luisma," "Sangre,"
- [13] LUIS NIKE SANTIAGO-MEDINA,
- [14] GABRIEL CASANOVA-YALES, a/k/a "Gaby Luchy,"
- [15] FERNANDO IAN CANINO-ORTIZ, a/k/a "Ian,"
- [16] CARLOS J. SANTOS-DIAZ, a/k/a "Mambiche,"
- [17] JUAN RUIZ-DIAZ, a/k/a "Pra Pra,"
- [18] RUBEN FIGUEROA-RODRIGUEZ, a/k/a "Ruben el Gordo,"
- [19] LUIS MIGUEL MUÑOZ-LOPEZ, a/k/a "Chino, Chino Grillo,"
- [20] LUIS ALBERTO CINTRON-COLLAZO, a/k/a "Pacho," "El Negro,"
- [21] PABLO DE LA CRUZ-ARIAS, a/k/a "Pablo El Diablo,"
- [22] PEDRO VICTOR NIEVES-HERNANDEZ, a/k/a "Pedrito,"
- [23] MARIO ALEXANDER RIVERA,
- [24] CARLOS A BENITEZ-ROLON, a/k/a "Charlie," "Charlie el Negro,"
- [25] JESUS DAVID MALDONADO-MORALES, a/k/a "Chu," "Chuito,"
- [26] YAN CARLOS DE JESUS-ORTIZ, a/k/a "Cepi," "Cepi El Escudo,"
- [27] ARSENIO LABORDE-FIGUEROA,
- [28] OMAR QUILES-ARCE a/k/a "Tibu,"
- [29] JUAN FRANCISCO TORRES-HUERTAS a/k/a "Cano," "Canito," "Jonathan,"
- [30] JULIO ANGEL GALARZA-ROSADO,
- [31] KEVIN JOMAR MALDONADO-ROSA,
- [32] ALEX DARNEL RODRIGUEZ-HUERTAS, a/k/a "Darnel,"
- [33] LINO ACOSTA-LOPEZ,
- [34] KRISTIAN DAMIAN MARTINEZ-CRUZ,
- [35] ANGEL RAFAEL TORRES-REYES, a/k/a "Mickey Wood,"
- [36] ORLANDO JOSE RODRIGUEZ-LARA a/k/a "Trippy,"
- [37] KIBANIELLE ICHAEAL COLON-MUÑIZ a/k/a "Kiba," "Kiva,"
- [38] CHRIS ANTHONY JIMENEZ-ORTIZ,
- [39] KENNY J RODRIGUEZ-RODRIGUEZ a/k/a "Kencho," "Kenny Kencho," "Ian,"
- [40] KEYSHLA MICHELLE RODRIGUEZ-ACEVEDO, AND
- [41] KELVIN JOEL TORRES-FLORES,

the defendants herein, aiding and abetting one another, did knowingly and intentionally

possess with intent to distribute two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (Crack), a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Vista Hermosa Public Housing Project, Villa Espana Public Housing Project and Luis Llorens Torres Public Housing Project.

All in violation of Title 21 U.S.C. §§ 841(a)(1)(b)(1)(A)(iii) and 860 and Title 18 U.S.C. § 2.

COUNT FOUR

21 U.S.C. § 841(a)(1) Possession/Distribution of Cocaine

From in or about the year 2016, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] CARLOS MANUEL COTTO-CRUZ, a/k/a "Wasa," "Zion," "Loco," "Alto Rango," "Ministro,"**
- [2] HECTOR LUIS SANTIAGO-MEDINA, a/k/a "Gordo Casco," "El Incorregible,"**
- [3] LUIS DANIEL GARCIA-HERNANDEZ, a/k/a "Luisda," "Ele-D," "El Enano,"**
- [4] JERMAINE CALDERON-ECHEVARRIA, a/k/a "Jey," "Jeso," "Pupi,"**
- [5] VICTOR ISAAC DEL VALLE-RIVERA,**
- [6] LUIS MANUEL ORTIZ-ROMERO, a/k/a "Yiyo,"**
- [7] JOSE LUIS CASTRO-VAZQUEZ, a/k/a "Manota,"**
- [8] FABIAN NIEVES-ROSALES, a/k/a "Chino,"**
- [9] KAREM LYNETTE VARCARCEL-CRUZ, a/k/a "La Prieta,"**
- [10] PEDRO ALEJANDRO OCASIO-HERNANDEZ, a/k/a "Chino,"**
- [11] GIOVANNI ANDRES REYES-CRUZ, a/k/a "Koala," "Ken-Y," "El Animal," "Koa,"**
- [12] LUIS MANUEL VEGA-QUILES, a/k/a "Luisma," "Sangre,"**
- [13] LUIS NIKE SANTIAGO-MEDINA,**
- [14] GABRIEL CASANOVA-YALES, a/k/a "Gaby Luchy"**
- [15] FERNANDO IAN CANINO-ORTIZ, a/k/a "Ian"**
- [16] CARLOS J. SANTOS-DIAZ, a/k/a "Mambiche,"**

- [17] JUAN RUIZ-DIAZ, a/k/a "Pra Pra,"
- [18] RUBEN FIGUEROA-RODRIGUEZ, a/k/a "Ruben el Gordo,"
- [19] LUIS MIGUEL MUÑOZ-LOPEZ, a/k/a "Chino, Chino Grillo,"
- [20] LUIS ALBERTO CINTRON-COLLAZO, a/k/a "Pacho," "El Negro,"
- [21] PABLO DE LA CRUZ-ARIAS, a/k/a "Pablo El Diablo,"
- [22] PEDRO VICTOR NIEVES-HERNANDEZ, a/k/a "Pedrito,"
- [23] MARIO ALEXANDER RIVERA,
- [24] CARLOS A BENITEZ-ROLON, a/k/a "Charlie," "Charlie el Negro,"
- [25] JESUS DAVID MALDONADO-MORALES, a/k/a "Chu," "Chuito,"
- [26] YAN CARLOS DE JESUS-ORTIZ, a/k/a "Cepi," "Cepi El Escudo,"
- [27] ARSENIO LABORDE-FIGUEROA,
- [28] OMAR QUILES-ARCE a/k/a "Tibu,"
- [29] JUAN FRANCISCO TORRES-HUERTAS a/k/a "Cano," "Canito," "Jonathan,"
- [30] JULIO ANGEL GALARZA-ROSADO,
- [31] KEVIN JOMAR MALDONADO-ROSA,
- [32] ALEX DARNEL RODRIGUEZ-HUERTAS, a/k/a "Darnel,"
- [33] LINO ACOSTA-LOPEZ,
- [34] KRISTIAN DAMIAN MARTINEZ-CRUZ,
- [35] ANGEL RAFAEL TORRES-REYES, a/k/a "Mickey Wood,"
- [36] ORLANDO JOSE RODRIGUEZ-LARA a/k/a "Trippy,"
- [37] KIBANIELLE ICHAEAL COLON-MUÑIZ a/k/a "Kiba," "Kiva,"
- [38] CHRIS ANTHONY JIMENEZ-ORTIZ,
- [39] KENNY J RODRIGUEZ-RODRIGUEZ a/k/a "Kencho," "Kenny Kencho,"
Ian,"
- [40] KEYSHLA MICHELLE RODRIGUEZ-ACEVEDO,
- [41] KELVIN JOEL TORRES-FLORES,

the defendants herein, aiding and abetting one another, did knowingly and intentionally, possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, the Luis Llorens Torres Public Housing Project.

All in violation of Title 21 U.S.C. §§ 841(a)(1)(b)(1)(A)(ii) and 860 and Title 18 U.S.C. § 2.

COUNT FIVE

21 U.S.C. § 841(a)(1)

Possession/Distribution of Marijuana

From in or about the year 2016, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] CARLOS MANUEL COTTO-CRUZ, a/k/a "Wasa," "Zion," "Loco," "Alto Rango," "Ministro,"
- [2] HECTOR LUIS SANTIAGO-MEDINA, a/k/a "Gordo Casco," "El Incorregible,"
- [3] LUIS DANIEL GARCIA-HERNANDEZ, a/k/a "Luisda," "Ele-D," "El Enano,"
- [4] JERMAINE CALDERON-ECHEVARRIA, a/k/a "Jey," "Jeso," "Pupi,"
- [5] VICTOR ISAAC DEL VALLE-RIVERA,
- [6] LUIS MANUEL ORTIZ-ROMERO, a/k/a "Yiyo,"
- [7] JOSE LUIS CASTRO-VAZQUEZ, a/k/a "Manota,"
- [8] FABIAN NIEVES-ROSALES, a/k/a "Chino,"
- [9] KAREM LYNETTE VARCARCEL-CRUZ, a/k/a "La Prieta,"
- [10] PEDRO ALEJANDRO OCASIO-HERNANDEZ, a/k/a "Chino,"
- [11] GIOVANNI ANDRES REYES-CRUZ, a/k/a "Koala," "Ken-Y," "El Animal," "Koa,"
- [12] LUIS MANUEL VEGA-QUILES, a/k/a "Luisma," "Sangre,"
- [13] LUIS NIKE SANTIAGO-MEDINA,
- [14] GABRIEL CASANOVA-YALES, a/k/a "Gaby Luchy,"
- [15] FERNANDO IAN CANINO-ORTIZ, a/k/a "Ian,"
- [16] CARLOS J. SANTOS-DIAZ, a/k/a "Mambiche,"
- [17] JUAN RUIZ-DIAZ, a/k/a "Pra Pra,"
- [18] RUBEN FIGUEROA-RODRIGUEZ, a/k/a "Ruben el Gordo,"
- [19] LUIS MIGUEL MUÑOZ-LOPEZ, a/k/a "Chino, Chino Grillo,"
- [20] LUIS ALBERTO CINTRON-COLLAZO, a/k/a "Pacho," "El Negro"
- [21] PABLO DE LA CRUZ-ARIAS, a/k/a "Pablo El Diablo,"
- [22] PEDRO VICTOR NIEVES-HERNANDEZ, a/k/a "Pedrito,"
- [23] MARIO ALEXANDER RIVERA,
- [24] CARLOS A BENITEZ-ROLON, a/k/a "Charlie," "Charlie el Negro"
- [25] JESUS DAVID MALDONADO-MORALES, a/k/a "Chu," "Chuito,"
- [26] YAN CARLOS DE JESUS-ORTIZ, a/k/a "Cepi," "Cepi El Escudo,"
- [27] ARSENIO LABORDE-FIGUEROA,
- [28] OMAR QUILES-ARCE a/k/a "Tibu"
- [29] JUAN FRANCISCO TORRES-HUERTAS a/k/a "Cano," "Canito," "Jonathan"
- [30] JULIO ANGEL GALARZA-ROSADO,
- [31] KEVIN JOMAR MALDONADO-ROSA,

[32] ALEX DARNEL RODRIGUEZ-HUERTAS, a/k/a "Darnel,"
[33] LINO ACOSTA-LOPEZ,
[34] KRISTIAN DAMIAN MARTINEZ-CRUZ,
[35] ANGEL RAFAEL TORRES-REYES, a/k/a "Mickey Wood,"
[36] ORLANDO JOSE RODRIGUEZ-LARA a/k/a "Trippy,"
[37] KIBANIELLE ICHAEAL COLON-MUÑIZ a/k/a "Kiba," "Kiva,"
[38] CHRIS ANTHONY JIMENEZ-ORTIZ,
[39] KENNY J RODRIGUEZ-RODRIGUEZ a/k/a "Kencho," "Kenny Kencho,"
Ian,"
[40] KEYSHLA MICHELLE RODRIGUEZ-ACEVEDO, AND
[41] KELVIN JOEL TORRES-FLORES,

the defendants herein, aiding and abetting one another, did knowingly and intentionally, possess with intent to distribute one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Vista Hermosa Public Housing Project, the Villa Espana Public Housing Project, the Luis Llorens Torres Public Housing Project.

All in violation of Title 21 U.S.C. §§ 841(a)(1)(b)(1)(B)(vii) and 860 and Title 18 U.S.C. § 2.

COUNT SIX
18 U.S.C. § 924(c)

Possession of Firearms in Furtherance of a Drug Trafficking Crime

From in or about the year 2016, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] CARLOS MANUEL COTTO-CRUZ, a/k/a "Wasa," "Zion," "Loco," "Alto Rango," "Ministro,"
[2] HECTOR LUIS SANTIAGO-MEDINA, a/k/a "Gordo Casco," "El Incorregible,"
[3] LUIS DANIEL GARCIA-HERNANDEZ, a/k/a "Luisda," "Ele-D," "El Enano,"

- [4] JERMAINE CALDERON-ECHEVARRIA, a/k/a "Jey," "Jeso," "Pupi,"
- [5] VICTOR ISAAC DEL VALLE-RIVERA,
- [7] JOSE LUIS CASTRO-VAZQUEZ, a/k/a "Manota,"
- [8] FABIAN NIEVES-ROSALES, a/k/a "Chino,"
- [9] KAREM LYNETTE VARCARCEL-CRUZ, a/k/a "La Prieta,"
- [10] PEDRO ALEJANDRO OCASIO-HERNANDEZ, a/k/a "Chino,"
- [11] GIOVANNI ANDRES REYES-CRUZ, a/k/a "Koala," "Ken-Y," "El Animal," "Koa,"
- [12] LUIS MANUEL VEGA-QUILES, a/k/a "Luisma," "Sangre,"
- [14] GABRIEL CASANOVA-YALES, a/k/a "Gaby Luchy,"
- [15] FERNANDO IAN CANINO-ORTIZ, a/k/a "Ian,"
- [16] CARLOS J. SANTOS-DIAZ, a/k/a "Mambiche,"
- [19] LUIS MIGUEL MUÑOZ-LOPEZ, a/k/a "Chino, Chino Grillo,"
- [20] LUIS ALBERTO CINTRON-COLLAZO, a/k/a "Pacho," "El Negro,"
- [21] PABLO DE LA CRUZ-ARIAS, a/k/a "Pablo El Diablo,"
- [22] PEDRO VICTOR NIEVES-HERNANDEZ, a/k/a "Pedrito,"
- [23] MARIO ALEXANDER RIVERA,
- [24] CARLOS A BENITEZ-ROLON, a/k/a "Charlie," "Charlie el Negro,"
- [25] JESUS DAVID MALDONADO-MORALES, a/k/a "Chu," "Chuito,"
- [27] ARSENIO LABORDE-FIGUEROA,
- [29] JUAN FRANCISCO TORRES-HUERTAS a/k/a "Cano," "Canito," "Jonathan,"
- [30] JULIO ANGEL GALARZA-ROSADO,
- [32] ALEX DARNEL RODRIGUEZ-HUERTAS, a/k/a "Darnel," and
- [33] LINO ACOSTA-LOPEZ,

the defendants herein, did knowingly and unlawfully possess firearms, of unknown make and caliber, as that term is defined in Title 18 U.S.C. §§ 921(a)(3), in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States: that is, possession with intent to distribute controlled substances as charged in Counts One through Five of this Indictment, pursuant to Title 21 U.S.C. §§ 841(a)(1). 846 and 860.

All in violation of Title 18 U.S.C. § 924(c)(1)(A):

COUNT SEVEN
Conspiracy to Launder Monetary Instruments
18 U.S.C. § 1956(a)(1)(B)(i) & (h)

From at least in or about the year 2017 and continuing up to and until the return of the instant Indictment, in Puerto Rico, and elsewhere, and within the jurisdiction of this Court,

**[2] HECTOR LUIS SANTIAGO-MEDINA, a/k/a “Gordo Casco,” “El Incorregible”
and
[40] KEYSHLA MICHELLE RODRIGUEZ-ACEVEDO**

the defendants herein, did knowingly combine, conspire, and agree with each other, and other diverse persons, known and unknown to the Grand Jury to commit offenses against the United States in violation of 18 U.S.C. §§ 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, drug trafficking, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to conduct financial transactions with the proceeds of drug trafficking that would conceal and disguise the nature, location, source, ownership, and control of the proceeds.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. At various times throughout the course of the conspiracy, co-conspirators would conduct financial transactions in which they delivered narcotics proceeds in the form of cash to use as down payments for the purchase of automobiles.
2. At various times throughout the course of the conspiracy, co-conspirators would submit false financial documents and would make false statements to financial institutions to receive loans for the purchase of automobiles, concealing and disguising the source of the funds to be used for payment.
3. At various times throughout the course of the conspiracy, co-conspirators would pay back the automobile loans with the narcotics proceeds.
4. At various times throughout the course of the conspiracy, vehicles would be registered in co-conspirators' names but were used by other co-conspirators to conceal and disguise their real ownership and control.
5. At various times throughout the course of the conspiracy, co-conspirators would transfer, receive, count, and distribute the profits from the sales of the controlled substances.

All in violation of Title 18 U.S.C. §§1956(a)(1)(B)(i) & (h).

NARCOTICS FORFEITURE ALLEGATION
21 U.S.C. § 853(a)(1) and (2)

1. The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21 U.S.C. § 853.
2. Pursuant to Title 21 U.S.C. § 853, upon conviction of an offense in violation of Title 21 U.S.C. § 846, the defendants shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes, but is not limited to, the following:

A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted, to wit: \$58,151,800.00 in U.S. Currency. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.
3. If any of the property described above, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21 U.S.C. § 853(p).

FIREARMS AND AMMUNITION FORFEITURE ALLEGATION
18 U.S.C. § 924(d)(1) & 28 U.S.C. § 2461(c)

The allegations contained in Counts One through Six of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18 U.S.C. § 924(d) and Title 28 U.S.C. § 2461(c).

Upon conviction of the offenses in violation of Title 18 U.S.C. § 924(c), set forth in Count Six of this Indictment, the defendants,

- [1] CARLOS MANUEL COTTO-CRUZ, a/k/a "Wasa," "Zion," "Loco," "Alto Rango," "Ministro,"
- [2] HECTOR LUIS SANTIAGO-MEDINA, a/k/a "Gordo Casco," "El Incorregible,"
- [3] LUIS DANIEL GARCIA-HERNANDEZ, a/k/a "Luisda," "Ele-D," "El Enano,"
- [4] JERMAINE CALDERON-ECHEVARRIA, a/k/a "Jey," "Jeso," "Pupi,"
- [5] VICTOR ISAAC DEL VALLE-RIVERA,
- [7] JOSE LUIS CASTRO-VAZQUEZ, a/k/a "Manota,"
- [8] FABIAN NIEVES-ROSALES, a/k/a "Chino,"
- [9] KAREM LYNETTE VARCARCEL-CRUZ, a/k/a "La Prieta,"
- [10] PEDRO ALEJANDRO OCASIO-HERNANDEZ, a/k/a "Chino,"
- [11] GIOVANNI ANDRES REYES-CRUZ, a/k/a "Koala," "Ken-Y," "El Animal," "Koa,"
- [12] LUIS MANUEL VEGA-QUILES, a/k/a "Luisma," "Sangre,"
- [14] GABRIEL CASANOVA-YALES, a/k/a "Gaby Luchy,"
- [15] FERNANDO IAN CANINO-ORTIZ, a/k/a "Ian,"
- [16] CARLOS J. SANTOS-DIAZ, a/k/a "Mambiche,"
- [19] LUIS MIGUEL MUÑOZ-LOPEZ, a/k/a "Chino, Chino Grillo,"
- [20] LUIS ALBERTO CINTRON-COLLAZO, a/k/a "Pacho," "El Negro,"
- [21] PABLO DE LA CRUZ-ARIAS, a/k/a "Pablo El Diablo,"
- [22] PEDRO VICTOR NIEVES-HERNANDEZ, a/k/a "Pedrito,"
- [23] MARIO ALEXANDER RIVERA,
- [24] CARLOS A BENITEZ-ROLON, a/k/a "Charlie," "Charlie el Negro,"
- [25] JESUS DAVID MALDONADO-MORALES, a/k/a "Chu," "Chuito,"

[27] ARSENIO LABORDE-FIGUEROA,
[29] JUAN FRANCISCO TORRES-HUERTAS a/k/a "Cano," "Canito,"
"Jonathan,"
[30] JULIO ANGEL GALARZA-ROSADO,
[32] ALEX DARNEL RODRIGUEZ-HUERTAS, a/k/a "Darnel," and
[33] LINO ACOSTA-LOPEZ

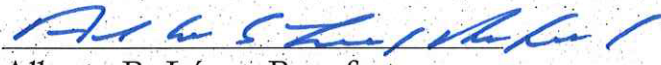
shall forfeit to the United States pursuant to Title 18 U.S.C. § 924(d) and Title 28 U.S.C. § 2461(c) any firearms and ammunition involved or used in the commission of the offense.


All pursuant to Title 18 U.S.C. § 924(d) and Title 28 U.S.C. § 2461(c).

W. STEPHEN MULDROW
United States Attorney

FOREPERSON

Date: May 17, 2022


Alberto R. López-Rocafort
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TRH